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## PARKER HANSKI LLC

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June 2, 2023

## Via ECF

The Honorable Jennifer E. Willis United States Magistrate Judge United States District Court 40 Foley Square New York, NY 10007 GRANTED. SO ORDERED.

JENNIFER E. WILLIS

United States Magistrate Judge

June 5, 2023

Re: Iris Jimenez v. 728 Property Associates Inc. and AMG 181 Quickserve LLC

Docket No. 1:21-cv-10121 (JW)

Dear Judge Willis:

We represent the Plaintiff in the above-entitled action. We write to respectfully ask the Court for a 30-day extension of the time to file the joint pretrial order ("JPTO") in this matter. This is the first request for an extension of filing the JPTO and Defendants join in this request.

By way of background, this action concerns the accessibility of a retail premises to Plaintiff, a disabled wheelchair user, pursuant to Title III of the Americans with Disabilities Act ("ADA"), 42 U.S.C. §§ 12181 *et. seq.*, and related state and local laws. As of May 8, 2023, fact and expert discovery is complete. See ECF No. 60. Therefore, pursuant to Your Honor's Individual Rules of Practice, the JPTO is due on June 7, 2023.

The Parties make this request as due to their continued settlement talks the Parties have made substantive progress in resolving all claims in this action. As such, the Parties seek this 30-day extension to allow them to focus their efforts and resources on resolving this action, as opposed to negotiating and drafting pretrial filings they may prove unnecessary. If this extension request is granted, the due date for the JPTO will be July 7, 2023.

Thank you for your time and attention to this matter.

Respectfully,

/s/

Adam S. Hanski